IA00007
patent application

IN THE UNITED STATES
PATENT AND TRADEMARK OFFICE

Applicant(s):	Donald Remboski Juergen Reinold John Bruner	Atty Docket No. IA00007	
Serial No.:	09/944,653	Group Art Unit:	**2153**
Filed:	08/31/2001	Examiner:	**Yasin M. Barqadle**
TITLE:	**LINKED VEHICLE ACTIVE NETWORKS**		

AFFIDAVIT
PURSUANT TO 37 C.F.R. §1.132

Assistant Commissioner of Patents
Washington, D.C. 20231

Dear Assistant Commissioner:

STATE OF ILLINOIS   )
                         :
COUNTY OF COOK   )

I, Juergen Reinold, being duly sworn, depose and say as follows:

I received a Vordiplom in Informatik (analogous to Bachelor of Science Degree in Computer Science) from the Rheinisch-Westfählische Technische Hochschule (RWTH) Aachen in Germany in 1985 and the Informatik Diplom (analogous to Master of Science Degree in Computer Science) the Rheinisch-Westfählische Technische Hochschule (RWTH) Aachen in Germany in 1989.

I have been employed by Motorola, Inc. since 1989 where I have served in various management and technical capacities. I spent most of my technical work at the Motorola

1

IA00007
patent application

Computer Group, both in Düsseldorf/Germany and in Tempe/Arizona. I have developed
system software, performed system and performance analysis on complex computing and
communication systems, and created the architecture for the StarMax Pro 6000 desktop
computer, "The Fastest Personal Computer On Earth" according to MacWeek Magazine
in August 1997. I led a team of engineers as the Chief Architect on a development effort
in Motorola geared towards the next generation systems architecture for automotive
electronic systems. I have published several papers and given key note speeches on
computer system performance and architecture issues. Additionally, I have inventively
contributed to more than thirty filed or issued US patents for Motorola.

I, Juergen Reinold, am an inventor of the above referenced patent application and
have reviewed U.S. Patent No. 6,370,449 (hereinafter '449) and U.S. Patent Publication
No. 2002/0150050 (hereinafter "050) and state the following:

The present invention teaches a vehicle comprising an active network. Neither
'449 nor '050 discloses or suggests a vehicle comprising an active network. Moreover,
even if the subject matter of '449 were combined with that of '050, this would not lead
anyone to develop the invention. For example, '449 in combination with '050 does not
teach all of the claimed features namely, a vehicle comprising an active network. See, for
example, independent claims 1, 15 and 28 of the application.

As is known in the art, traditional data networks (passive networks) passively
transport messages from one end node to another. Such passive networks are only aware
of the destination of messages passing through the nodes and are specifically designed to
deliver exactly one unmodified copy of the message to its ultimate destination. The
passive network is insensitive to the messages it carries and the messages are transferred
between nodes without modification. This is exclusively the type of network taught in
'449 and '050.

As understood by those skilled in the art of computing and networking, an active
network is a network in which the nodes can perform custom operations on the messages
that pass through the nodes. An active network does not require a central server or
computing resource. Active network nodes are aware of the contents of the messages

2

IA00007
patent application

transported and can participate in the processing and modification of the messages while
they travel through the network.

'449 teaches an in-car network that is built around an on-board compute platform
where all components of the in-car network are either directly plugged into the compute
platform or coupled to it via an Ethernet connection (Figure 2, and column 6, lines 10-
18). In addition, '449 reinforces that all computing for the in-car network goes through a
central computing resource by stating that "compute platform 22 is at the center of in-car
sub-network 20." (column 8, lines 21-22). The central compute platform exclusively
manages the routing of packets to each end node. Central compute platform is at the
center of a passive network. Nodes in '449 cannot perform custom operations on
messages passing through them. In addition nodes in '449 are not aware of, and cannot
participate in the processing or modification of, the contents of messages passing through
them. Therefore, nowhere does '449 teach or suggest an active network as understood by
those skilled in the art.

'449 fails to teach a vehicle comprising an active network. Consequently, even if
'050 were combined with of '449 or any other reference of record, such a combination
would not lead to the practice of the invention. See, for example, independent claims 1,
15 and 28 of the application.

I hereby declare that all statements made herein of my own knowledge are true
and that all statements made on information and belief are believed to be true. I further
declare that these statements are made with the knowledge that willful false statements
and the like so made are punishable by fine or imprisonment, or both, under Section 1001
of Title 18 of the United States Code and that such willful and false statements may
jeopardize the validity of the subject patent application or any patent issued thereon.

I further declare that I have received no special compensation or consideration for
making this affidavit, nor have I been in any way told, either directly or by implication or
inference, by anyone that my employment by Motorola, Inc. or my professional
advancement or other matters of personal or professional interest to me depend in any
way on whether or not I make this affidavit or the content thereof. I further declare that I

3

IA00007
patent application

make this affidavit of my own free will and choice without any duress or influence of any kind, believing fully in the truth of the statements made by myself herein.

_____
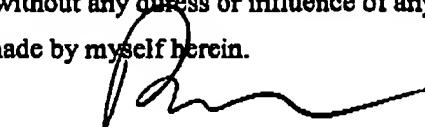
Juergen Reinold

I, Ellen Beth Grabow, a Notary Public in and for the County and State aforesaid, do hereby certify that Juergen Reinold, whose name is subscribed to the foregoing instrument, appeared before me this day in person and acknowledged that he signed, sealed and delivered the said instrument as his free and voluntary act and deed for the uses and purposes therein set forth.

Given under my hand and Notary Seal this 10 day of December, 2004.

My commission expires on ___12/28/07___

SEAL

Official Seal
Ellen Beth Grabow
Notary Public State of Illinois
My Commission Expires 12/28/07

4